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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
SCHUTTE BAGCLOSURES INC.,)	Case No. 12-cv-5541
Plaintiff,)	ECF CASE
)	
v.)	
)	
KWIK LOK CORPORATION, a Washington State)	
Corporation,)	
)	
Defendant.)	
_____)	

**DECLARATION OF LORNE HOUSE IN SUPPORT OF DEFENDANT'S MOTION
TO DISMISS THE AMENDED COMPLAINT PURSUANT TO FEDERAL RULES OF
CIVIL PROCEDURE 12(B)(1) AND/OR 12(B)(6), OR TRANSFER THE CASE**

I, Lorne House, hereby declare:

1. I am the Controller for the Washington based Kwik Lok Corporation, defendant in the above-captioned litigation ("Kwik Lok"). I respectfully submit this declaration in support of Kwik Lok's request to transfer venue to the Western District of Washington under 28 U.S.C. § 1404(a).

2. The corporate offices of Kwik-Lok are located in Yakima, Washington. Most of Kwik Lok's products are manufactured in Washington, which is where Kwik Lok's

business was founded and registered and where its principal place of business continues to be today. Kwik Lok's trademarks and trade dress were designed and established in Washington. Kwik Lok obtained registrations for the trademarks and trade dress at issue in this dispute through trademark counsel, Seed Intellectual Property Law Group, located in Seattle, Washington. The documents, products, and other tangible items that will be requested through discovery are located at Kwik Lok's headquarters in Washington and/or with Kwik Lok's attorneys, contractors, and vendors in and around Washington.

3. The individuals with knowledge of Kwik Lok's corporate and legal matters, Kwik Lok's marketing and sales activities, the Kwik Lok trademark and patent portfolios and other intellectual property rights, and other facts relevant to this case reside in the state of Washington. The below is a list of witnesses for Kwik Lok who live in the state of Washington. These witnesses have testimony that is material to this litigation. They will be inconvenienced if this action is not transferred to the state of Washington:

Witness	Title	Knowledge	Location
J. Paxton	CEO	Full	Yakima, WA
H. Miller	VP Sales	Sales	Yakima, WA
K. Hart	Chief Engineer	Engineering	Yakima, WA
J. Rothen-Bueler	CPA	Accounting	Yakima, WA

4. All of Kwik Lok's documents that are relevant to this litigation are located in Yakima, Washington.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Yakima, Washington
December 28, 2012

Lorne J. House

Lorne House